

Exhibit J

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

GREGORY GOODWIN

Plaintiff,

-vs-

ACCURIDE ERIE, LP

Defendant.

Civil Action
No. 05-161

CERTIFIED TRANSCRIPT

DEPOSITION OF: SABRINA GORE

DATE: June 28, 2006
Wednesday, 9:00 a.m.

LOCATION: 150 East 8th Street
Erie, PA

TAKEN BY: Plaintiff
Gregory Goodwin

REPORTED BY: Cynthia A. Hawley
Notary Public
AKF Reference No. CH95362B

1 A. They could run, but they couldn't run it with
2 tag.

3 Q. And if they couldn't run it with tag that's
4 another way of saying that any time people had
5 to take a break they had to shut down the
6 lines?

7 A. That's correct.

8 Q. So certainly as a result of your going home you
9 understood that they would not be able to do
10 the production they otherwise would have been
11 able to do?

12 A. Not necessarily.

13 Q. But probably?

14 A. Not necessarily. Those lines go down all the
15 time.

16 Q. Yeah. But let's put it this way, all things
17 being equal, the fact that you are not there,
18 meaning they don't have the tag means that now
19 they've also got to shut down for breaks?

20 A. That's correct. But if Plyler and Goodwin
21 wouldn't have lied in the first place then I
22 would have been in my normal spot on the line.

23 Q. Okay. Now, you've had other discipline, have
24 you not?

25 A. That's correct.

1 Q. Was that the first time you were disciplined,
2 or were there other times?

3 A. That's the first time.

4 Q. That's in March of 2004, correct?

5 A. That's correct.

6 Q. What other times have you been disciplined?

7 A. Another time I don't, like I said, I don't
8 remember the exact dates. I think I was, want
9 to say April of, I'm not really sure. I can
10 tell you the incident. I don't have the dates
11 programmed into my mind. I had a issue where
12 me and my friend, he played a joke on me and
13 put white power on my book. He's a white male.
14 It's a guy that I hang with outside of work.
15 Nothing that I instigated.

16 Another time, and like I said, I
17 couldn't give you the dates as far as, but a
18 guy got upset with me because a supervisor told
19 him to do something. And he got in my face
20 about it. And we had a argument. And then the
21 last time because I didn't put my clock number
22 on a valve stem.

23 Q. On a valve stem?

24 A. Um-hum.

25 Q. I take it that's the way you identify the fact

1 COMMONWEALTH OF PENNSYLVANIA) CERTIFICATE
2 COUNTY OF ERIE) SS:

3 I, Cynthia A. Hawley, a Court Reporter and
4 Notary Public in and for the Commonwealth of
5 Pennsylvania, do hereby certify that the witness,
6 SABRINA GORE, was by me first duly sworn to testify
7 to the truth; that the foregoing deposition was taken
8 at the time and place stated herein; and that the
9 said deposition was recorded stenographically by me
10 and then reduced to printing under my direction, and
11 constitutes a true record of the testimony given by
12 said witness.

13 I further certify that the inspection, reading
14 and signing of said deposition were NOT waived by
15 counsel for the respective parties and by the
16 witness.

17 I further certify that I am not a relative or
18 employee of any of the parties, or a relative or
19 employee of either counsel, and that I am in no way
20 interested directly or indirectly in this action.

21 IN WITNESS WHEREOF, I have hereunto set my hand
22 and affixed my seal of office this 17th day of July,
23 2006.

24 Cynthia A. Hawley
25 Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cynthia A. Hawley, Notary Public
City Of Erie, Erie County
Pittsburgh, PA 412-261-2324
412-261-2324
Member, Pennsylvania Association of Notaries

Erie, PA
814-453-5700

AKF